

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEBRASKA

GREEN PLAINS TRADE GROUP LLC,)	
GREEN PLAINS INC.,)	
GREEN PLAINS WOOD RIVER LLC,)	
GREEN PLAINS ORD LLC,)	
GREEN PLAINS ATKINSON LLC,)	
GREEN PLAINS CENTRAL CITY LLC,)	
GREEN PLAINS YORK LLC,)	
GREEN PLAINS SHENANDOAH LLC,)	
GREEN PLAINS OTTER TAIL LLC,)	
GREEN PLAINS FAIRMONT LLC,)	
GREEN PLAINS HEREFORD LLC,)	Case No. 8:20-cv-00279-LSC-MDN
GREEN PLAINS MOUNT VERNON LLC,)	
GREEN PLAINS MADISON LLC,)	Hon. Laurie Smith Camp
GREEN PLAINS HOPEWELL LLC,)	
GREEN PLAINS SUPERIOR LLC,)	Magistrate Judge Hon. Michael D. Nelson
GREEN PLAINS OBION LLC,)	
GREEN PLAINS BLUFFTON LLC,)	ORAL ARGUMENT REQUESTED
individually and on behalf of all others)	
similarly situated,)	
)	
Plaintiffs)	
)	
v.)	
)	
ARCHER DANIELS MIDLAND)	
COMPANY,)	
)	
Defendant.)	

ADM'S MOTION TO TRANSFER VENUE OF PLAINTIFFS'
CLASS ACTION COMPLAINT UNDER 28 U.S.C. § 1404(a)

Pursuant to 28 U.S.C. § 1404(a), Defendant Archer Daniels Midland Company ("ADM") moves to transfer Plaintiffs Green Plains Trade Group LLC, Green Plains Inc., Green Plains Wood River LLC, Green Plains ORD LLC, Green Plains Atkinson LLC, Green Plains Central City LLC, Green Plains York LLC, Green Plains Shenandoah LLC, Green Plains Otter Tail LLC, Green Plains Fairmont LLC, Green Plains Hereford LLC, Green Plains Mount Vernon LLC, Green Plains

Madison LLC, Green Plains Hopewell LLC, Green Plains Superior LLC, Green Plains Obion LLC, and Green Plains Bluffton LLC's (collectively "Green Plains") Class Action Complaint to the Central District of Illinois. As explained in detail in the accompanying memorandum in support, this case should be transferred to the Central District of Illinois because it is a proper venue and has personal jurisdiction over ADM. Moreover, the interests of justice and the convenience of the parties and witnesses favor transfer. The first-to-file rule also supports transfer because a substantially similar case already pending in the Central District of Illinois was filed 10 months prior and a second case was filed in the jurisdiction in July. Defendant requests oral argument in order to respond to any questions the Judge may have about any of the issues raised in the accompanying memorandum.

Wherefore, Defendant respectfully requests that this Court transfer this case to the Central District of Illinois. If this Court declines to transfer, ADM respectfully urges this Court to dismiss this case with prejudice for the reasons stated in ADM's motion to dismiss.

Dated: September 14, 2020

Respectfully Submitted,

ARCHER DANIELS MIDLAND COMPANY

s/ John P. Passarelli

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CERTIFICATE OF SERVICE

I hereby certify that on September 14, 2020, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will send notification of such filing to the following:

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